

Hardesty, Doug

From: Hardesty, Doug
Sent: Tuesday, April 15, 2014 9:45 AM
To: Kuterbach, John F (DEC); Baumgartner, James R (DEC)
Cc: Dossett, Donald; Meyer, Dan
Subject: RE: EPA Region 10 Objection Letter to Permit #AQ0267TVP02

John,

Let me check with our legal folks regarding whether we can add additional remedies to our objection (now that our deadline has passed) and, if we can, whether we can extend your deadline to make the changes. If we can't officially add additional remedies, one alternative is for us to require you to reopen the permit after it is issued (assuming some PSD permit limits are still in error). It seems like that would be a waste of your time and effort.

Note that there is nothing stopping you from making other adjustments to this permit when you address our required remedies. In fact, you should proactively address known errors when you find them, particularly when you are making other edits and reprocessing/reissuing the permit.

I'll let you know what I find out.

Doug Hardesty
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From: Kuterbach, John F (DEC) [<mailto:john.kuterbach@alaska.gov>]
Sent: Monday, April 14, 2014 5:31 PM
To: Hardesty, Doug; Baumgartner, James R (DEC)
Cc: Dossett, Donald; Meyer, Dan
Subject: RE: EPA Region 10 Objection Letter to Permit #AQ0267TVP02

Hello all,

Sorry I did not catch Jim's email earlier. If we are adding to the remedy required to satisfy the EPA objection, then I will need the addition in writing from Don, along with confirmation that the 90 days begins when we received the amended identification of remedy.

thanks

John Kuterbach

From: Hardesty, Doug [<mailto:Hardesty.Doug@epa.gov>]
Sent: Monday, April 14, 2014 11:59 AM
To: Baumgartner, James R (DEC); Kuterbach, John F (DEC)

Cc: Dossett, Donald; Meyer, Dan

Subject: FW: EPA Region 10 Objection Letter to Permit #AQ0267TVP02

Jim,

I am responding to your email to Dan this morning regarding clarification on the ConocoPhillips objection letter.

We should have clarified that all of the limits in the permit that originated in the EPA-issued PSD permit need to be returned to their original wording and meaning. The objection letter focused a bit too much on the specifics that were being debated in some of the communications.

If you have any questions, please feel free to call or email me.

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From: Baumgartner, James R (DEC) [<mailto:jim.baumgartner@alaska.gov>]

Sent: Monday, April 14, 2014 10:24 AM

To: Meyer, Dan

Cc: Baumgartner, James R (DEC); Kuterbach, John F (DEC)

Subject: RE: EPA Region 10 Objection Letter to Permit #AQ0267TVP02

Hi Dan,

A point of clarification regarding full load footnotes and remedy. Conditions 18 Table D and Condition 19 Table E for heaters and the incinerator respectively have a footnote one indicating that BACT emission limits applies at full load. Those two conditions weren't mentioned in our 45-day EPA checklist for EPA to review.

For the remedy packet, please advise whether it would be EPA's intent also to remove those analogous footnotes from Table D and Table E.

Regards,

Jim Baumgartner

From: Meyer, Dan [<mailto:Meyer.Dan@epa.gov>]

Sent: Thursday, April 10, 2014 2:25 PM

To: Kuterbach, John F (DEC)

Cc: Hardesty, Doug; Dossett, Donald; Baumgartner, James R (DEC)

Subject: EPA Region 10 Objection Letter to Permit #AQ0267TVP02

Greetings John,

I am acting today for Don Dossett while he is away on travel. In my capacity as acting unit manager, I am notifying you here that EPA Region 10 is objecting to ADEC's issuance of Title V renewal permit to ConocoPhillips for Kuparuk Central Production Facility No. 1. I am referring to permit #AQ0267TVP02. I have attached our objection letter to this email. The actual letter is in the mail.

Please let us know asap whether you plan to withdraw the two BP proposed permit renewals with the same issue. If you have any questions, let me know.

Dan Meyer
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